UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RR DONNELLEY FINANCIAL, INC., a Delaware Corporation, RRD FINANCIAL OF NEW YORK CITY, L.L.C., a New York L.L.C.,	)	Case No. ____________
Plaintiffs,	)	
vs.	)	
ROBERT J. MUELLER, an individual, and MERRILL CORPORATION, a Minnesota Corporation,	)	
Defendants.	)	

DECLARATION OF PEGGY COHEN IN SUPPORT OF PLAINTIFFS' MOTION FOR A TEMPORARY RESTRAINING ORDER

I, Peggy Cohen, declare as follows:

1. I am a Vice President and Managing Director for Capital Markets in the New York, New York office of RR Donnelley Financial, Inc. f/k/a Bowne & Co., Inc. (hereinafter, "RRD"). I make this declaration of my own personal knowledge, and, if called as a witness, I could and would testify competently to the matters stated herein.

2. As a managing director of sales for RRD, I manage sales executives assigned to my region, providing the sales executives with extensive sales, marketing, and administrative support.

3. One of the sales executives I helped manage at RRD was former Senior Vice President of sales, Robert J. Mueller ("Mueller").

4. In the global integrated communications industry, our most valuable business assets are our personal relationships with our clients. In addition, members of our sales force are privy to confidential and sensitive information about our clients that gives us a significant

advantage over our competitors. This confidential and sensitive information includes, but is not limited to, client lists, the identity of upcoming but unannounced projects, the identity of the key decisionmakers and contacts at larger clients, client pricing, client preferences and client ordering history.

5. In July 2011, I had heard from others that Mueller was taking a family vacation to the New Jersey shore at the end of the month. When he returned, I asked him how his trip was and Mueller told me that he had enjoyed the beach, that they had great weather, and that he had enjoyed his time with his son. I was surprised to learn later that Mueller had actually been in Australia calling on our clients during his time away.

6. On August 5, 2011, RRD employee Bryan Garabo informed me that we would not be handling the S-3 filing of a key RRD client assigned to Mueller, Validus Holdings Limited. That same day, I asked Mueller where the S-3 filing had gone, and he responded that he did not know where, but that it was "at another printer."

I declare under penalty of perjury under the laws of the State of New York and the United States that the foregoing is true and correct.

Executed this 17th day of August 2011, at New York, New York.

Peggy Cohen

MITCHELL GOLDSMITH
Notary Public, State of New York
No. 01GO6002905
Qualified in New York County
Commission Expires Feb. 17, 2014

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